

IN THE UNITED STATES OF AMERICA

EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA

v.

ROBERTO CLEMENTE PARKER, a/k/a “Berto,”

JAMES EARL TYNES, a/k/a “Scuffer,” “Scuff,”

KEVIN DANTE PARKER, a/k/a “Grit,”

ERNEST BROWN, a/k/a “Lean Belly,”

ROOSEVELT M. SIMMONS, a/k/a “Blackjack,”

ANTONIO C. FLOWERS, a/k/a “Baseline,”

RANDOLPH ELLIS, a/k/a “Randy,”

ALVIN L. MASSENBURG, JR., a/k/a “Toot,”

BENZIE R. SEABORNE

BRIAN DEMETRIUS CLARKE, a/k/a “Omar,”

CASSANDRA BLUNT,

CLIFTON WOOTEN,

GARY M. BRIGGS, JR. a/k/a “Mess,”

DERRICK DIMETREUS BAILEY, JR.,

NAVYETA C. KING, a/k/a “Tiny Baby,”

ANGELO M. CLAIBORNE, a/k/a “Anlo,”

RODNEY K. CLAIBORNE, a/k/a “B-Bop,” and

KEITH HOWARD HILTON, a/k/a “Keisha,”

UNDER SEAL

Criminal Action No. 3:02CR _____

Count 1

Conspiracy to Distribute Crack Cocaine
(21 U.S.C. § 846)

Count 2

Maintenance of a Crack House
(21 U.S.C. § 856)

Forfeiture

(21 U.S.C. § 853)

INDICTMENT

January 2002 Term - At Richmond

COUNT ONE

(Conspiracy to Distribute)

THE GRAND JURY CHARGES beginning in or about January 1997, the exact date being unknown, and continuing thereafter until the date of this Indictment, in the Eastern District of Virginia and elsewhere, and within the jurisdiction of the Court, the defendants ROBERTO CLEMENTE PARKER, a/k/a "Berto;" JAMES EARL TYNES, a/k/a "Scuffer," "Scuff;" KEVIN DANTE PARKER, a/k/a "Grit;" ERNEST BROWN, a/k/a "Lean Belly;" ROOSEVELT M. SIMMONS, a/k/a Blackjack;" ANTONIO C. FLOWERS, a/k/a "Baseline;" RANDOLPH ELLIS, "Randy;" ALVIN L. MASSENBURG, JR., a/k/a "Toot;" BENZIE R. SEABORNE; BRIAN DEMETRIUS CLARKE, a/k/a "Omar;" CASSANDRA BLUNT; CLIFTON WOOTEN; GARY M. BRIGGS, JR. a/k/a "Mess;" DERRICK DIMETREUS BAILEY, JR.; NAVYETA C. KING, a/k/a "Tiny Baby;" ANGELO M. CLAIBORNE, a/k/a "Anlo;" RODNEY K. CLAIBORNE, a/k/a "B-Bop;" and KEITH HOWARD HILTON, a/k/a "Keisha," did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with each other and other people, both known and unknown to the Grand Jury, to commit offenses against the United States, to wit:

(a) to manufacture more than fifty (50) grams of a mixture or substance containing detectable amounts of cocaine base, commonly known as "crack," a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 and 841(b)(1)(A)(iii); and

(b) to possess with the intent to distribute more than fifty (50) grams of a mixture or substance containing detectable amounts of cocaine base, commonly known as “crack,” a Schedule II controlled substance, in violation of Title 21, United States Code Sections 841 and 841(b)(1)(A)(iii).

(All in violation of Title 21, United States Code, Section 846.)

COUNT TWO

(Maintenance of Place for Distributing Controlled Substances)

THE GRAND JURY FURTHER CHARGES beginning in or about January 1997, the exact date being unknown, and continuing until the date of this Indictment, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, KEITH HOWARD HILTON, a/k/a “Keisha,” did knowingly and unlawfully maintain a place, to wit: a property and residence known as 20 Clubhouse Road, Dendron, Virginia, and did aid and abet in the maintenance of said residence, for the purpose of manufacturing, storing, distributing and using controlled substances, and did manage and control a building, room, and enclosure, as an owner or lessee, and did knowingly and intentionally make it available for use for the purpose of unlawfully manufacturing, storing, distributing and using controlled substances.

(In violation of Title 21, United States Code, Section 856, and Title 18, United States Code, Section 2.)

FORFEITURE BASED UPON COUNT ONE

As a result of any of the foregoing offenses, the defendants shall forfeit to the United States of America any and all property constituting or derived from any proceeds obtained,

directly or indirectly, as the result of said violation; and any and all of said property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the aforesaid violation, including but not limited to the following:

- A. the sum of \$444,000.00 representing the proceeds of drug trafficking;
- B. 1992 Chevrolet registered to Alvin L. Massenburg, Jr., VIN: 1GNDUO6D6T125100;
- C. 1998 Ford registered to Benzie Ramon Seabome and Maurice Jones Seabome, VIN: 1FMRU18W8WLA99728;
- D. 1990 Honda registered to Sharonicka A. Rose, VIN: 1HGCB7551LAO44562.
- E. 1991 Nissan registered to Gary Marcellous Briggs, Jr., VIN: JN1MS36P2MW007703;
- F. 1989 Toyota Camry registered to Roosevelt Simmons, VIN: JT2SV24E1K3318246;
- G. 1987 Mercury registered to Alvin Massenburg, Jr., VIN: 2MEBM74F0HX609363;
- H. 1988 Honda registered to Melanie Vanessa Brown, VIN: 1HGED3548JA001384;
- I. 1995 Mazda registered to Laverne Tynes, VIN: JM1TA221XS1146205;
- J. 1992 Toyota registered to Clarence F. Parker, Jr., VIN: JT2SK12E0N0061737; and
- K. 1995 Honda registered to Tenesha Monique Massenburg, VIN: 1HGCD5650SA033791.

(In accordance with 21 U.S.C. § 853.)

A TRUE BILL

FOR PERSON

PAUL J. McNULTY
UNITED STATES ATTORNEY

By:

Laura C. Marshall
Assistant United States Attorney